

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

FILED

2022 MAY 10 AM 9:21

IN RE:

W.R. GRACE & CO., et al,

Case No. 01-1139(AMC)

Reorganized Debtors,

Chapter 11

AUTRY EARL BARNEY,
Movant,

Related to Doc. No. 33170
33179 and 33171

CLERK
US BANKRUPTCY COURT
DISTRICT OF DELAWARE

V.

WRG ASBESTOS PI TRUST
Respondent

MOVANT ORDER MOTION FOR SETTLEMENT RELIEF

Pursuant to Sections 524 and Section 101 of the Bankruptcy Code. The Bankruptcy Court for the District of Delaware shall have any matter arising under the Bankruptcy Code. Any matter arising in or related to the Chapter 11 Case. The plan or the WRG Asbestos PI Trust.

This Bankruptcy Court made a ruling that this trust WRG Asbestos PI Trust to pay for all asbestos exposure. This trust is giving me the run around. Fed.R.App.P.27. On page Five and part three of the proof of claim form. These are the other WRG products that I was exposed of, and my father. Monokote Zonolite Super 40. Zonolite Plaster. On page 6, I filled out the four blocks that will explain how I was exposed to this company's

product and my father.

I was also exposed by washing his clothes. I want this court to award me the maximum value of \$15,000, plus the Sequencing Adjustment.

Sincerely,

Autry Earl Barney Pro Se.

Autry Earl Barney Pro Se.

CERTIFICATE OF SERVICE

FILED

This is to certify that I, Autry Earl Barney, have this day mailed by United States Mail, postage prepaid, a true and correct copy of the above and foregoing document to the following with notice to counsel:

2022 MAY 10 AM 9:21
CLERK
US BANKRUPTCY COURT
DISTRICT OF DELAWARE

Shannon M. Clougherty
CAMPBELL & LEVINE
310 Grant Street, Suite 1700
Pittsburgh, PA 15219-2399
T (412)261-0310
F (412) 261-5066

This the 2 day of May, 2022

Autry Earl Barney pro se.
AUTRY EARL BARNEY PRO SE.

Autry Earl Barney
517 Cherry Ave.
Jackson, Alabama 36545-3607
(251)387-0443

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Telephone: 412-261-0310
Facsimile: 412-261-5066

Shannon M. Clougherty • sclougherty@camlev.com

Campbell & Levine, LLC
Attorneys at Law

April 25, 2022

Via Federal Express

Mr. Autry Earl Barney
517 Cherry Avenue
Jackson, AL 36545

Re: W.R. Grace ("WRG") Asbestos PI Trust Claim 38553519

Dear Mr. Barney:

As you know, this law firm represents the WRG Asbestos PI Trust (the "Trust"). We received your April 6, 2022 letter regarding WRG Asbestos PI Trust Claim 38553519 (the "Claim"). Your letter states that your father received a settlement in 1997, which predates the formation of the Trust by seventeen (17) years. Accordingly, we do not have any information about this settlement, and do not believe that such settlement has any impact on the Claim.

Your letter also states that you and your father were exposed to many WRG products, including products used in homes. Claimants must supply the Trust with credible evidence in a Proof of Claim that identifies the type of WRG asbestos-containing product to which they were exposed, as well as a description of how they were exposed in order to meet the requirements of the Trust Distribution Procedures (the "TDP"). Simply stating that you and your father were exposed to many products does not meet that requirement. In addition, as we have explained previously in several letters, the Claim violates the applicable statute of limitations provisions of Section 5.1(a)(2) of the TDP.

On December 3, 2020 you filed a *Letter Motion* with the United States Bankruptcy Court for the District of Delaware concerning the Claim. At that time, we wrote to you about the deficiencies of the Claim, the information that you needed to provide to cure the deficiencies, and how to cure the deficiencies. Counsel for the Trust attended the telephonic Court hearing in January of 2021, that your *Letter Motion* necessitated. You chose not to attend that telephonic hearing and have since engaged us in numerous rounds of correspondence exchanges. In each of those exchanges, we have reiterated the necessary steps you need to take to resolve the deficiencies with the Claim. Unfortunately, you have not remedied these issues.

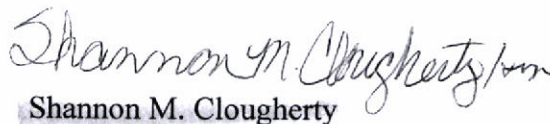
Autry Earl Barney

April 25, 2022

Page 2

Accordingly, enclosed with this letter are the necessary forms if you want to pursue the Trust's denial of the Claim through the Trust's Alternative Dispute Resolution ("ADR") process pursuant to the TDP's ADR rules. Feel free to call me with any questions about that process.

Sincerely,


Shannon M. Clougherty

cc: David Salzman (via email dsalzman@camlev.com)